

**BATHAE DUNNE LLP**  
Yavar Bathaee (CA 282388)  
yavar@bathaeedunne.com  
Andrew C. Wolinsky (CA 345965)  
awolinsky@bathaeedunne.com  
Allison Watson (CA 328596)  
awatson@bathaeedunne.com  
Priscilla Ghiță (*pro hac vice*)  
pghita@bathaeedunne.com  
445 Park Avenue, 9th Floor  
New York, NY 10022  
Tel.: (332) 322-8835

Brian J. Dunne (CA 275689)  
bdunne@bathaeedunne.com  
Edward M. Grauman (*pro hac vice*)  
egrauman@bathaeedunne.com  
901 South MoPac Expressway  
Barton Oaks Plaza I, Suite 300  
Austin, TX 78746  
Tel.: (213) 462-2772

*Interim Co-Lead Counsel for the  
Advertiser Classes*

[Additional counsel on signature page]

**SCOTT+SCOTT ATTORNEYS AT LAW LLP**  
Amanda F. Lawrence (*pro hac vice*)  
alawrence@scott-scott.com  
Patrick J. McGahan (*pro hac vice*)  
pmcgahan@scott-scott.com  
Michael P. Srodoski (*pro hac vice*)  
msrodoski@scott-scott.com  
156 South Main Street, P.O. Box 192  
Colchester, CT 06415  
Tel.: (860) 537-5537

Patrick J. Coughlin (CA 111070)  
pcoughlin@scott-scott.com  
Carmen A. Medici (CA 248417)  
cmedici@scott-scott.com  
Hal D. Cunningham (CA 243048)  
hcunningham@scott-scott.com  
Patrick J. Rodriguez (*pro hac vice*)  
prodriguez@scott-scott.com  
Daniel J. Brockwell (CA 335983)  
dbrockwell@scott-scott.com  
600 W. Broadway, Suite 3300  
San Diego, CA 92101  
Tel.: (619) 233-4565

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:20-cv-08570-JD

**ADVERTISER PLAINTIFFS’  
ADMINISTRATIVE MOTION TO FILE  
DOCUMENTS TEMPORARILY UNDER  
SEAL**

Hearing Date: To Be Determined  
Hearing Time: To Be Determined  
Courtroom 11, 19th Floor  
Judge: The Honorable James Donato

Pursuant to Civil Local Rules 7-11 and 79-5, and the Court's Order Modifying Sealing Procedures Relating to Dispositive Motions and Merits *Daubert* Briefing, entered in this action on March 25, 2024 (Dkt. 745), Advertiser Plaintiffs Affilious, Inc., Jessyca Frederick, Mark Berney, 406 Property Services, PLLC, Mark Young, and Katherine Looper submit this administrative motion to file under temporary seal the unredacted version of Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion to Exclude Expert Testimony and Opinions of Markus Jakobsson. Advertiser Plaintiffs file this document under temporary seal solely because it contains information designated Confidential or Highly Confidential by Meta under the Protective Order, not because Advertiser Plaintiffs believe it meets the sealing standard (for nearly all of this information, Advertiser Plaintiffs do not believe it meets the sealing standard, and may oppose sealing). Pursuant to the Court's Order (Dkt. 745), the reasons for sealing will be discussed in a forthcoming omnibus sealing motion. A redacted copy of the document filed under temporary seal has been filed on the public docket. Advertiser Plaintiffs also hereby provide notice of lodging to all parties and their counsel pursuant to Civil Local Rule 79-5(e).

Dated: January 29, 2025

**BATHAE DUNNE LLP**

By: /s/ Yavar Bathaee

Yavar Bathaee (CA 282388)  
yavar@bathaeedunne.com  
Andrew C. Wolinsky (CA 345965)  
awolinsky@bathaeedunne.com  
Priscilla Ghiță (*pro hac vice*)  
pghita@bathaeedunne.com  
445 Park Avenue, 9th Floor  
New York, NY 10022  
Tel.: (332) 322-8835

Brian J. Dunne (CA 275689)  
bdunne@bathaeedunne.com  
Edward M. Grauman (*pro hac vice*)  
egrauman@bathaeedunne.com  
901 South MoPac Expressway  
Barton Oaks Plaza I, Suite 300  
Austin, TX 78746  
Tel.: (213) 462-2772

**SCOTT+SCOTT  
ATTORNEYS AT LAW LLP**

By: /s/ Amanda F. Lawrence

Amanda F. Lawrence (*pro hac vice*)  
alawrence@scott-scott.com  
Patrick J. McGahan (*pro hac vice*)  
pmcgahan@scott-scott.com  
Michael P. Srodoski (*pro hac vice*)  
msrodoski@scott-scott.com  
156 South Main Street, P.O. Box 192  
Colchester, CT 06415  
Tel.: (860) 537-5537

Patrick J. Coughlin (CA 111070)  
pcoughlin@scott-scott.com  
Carmen A. Medici (CA 248417)  
cmedici@scott-scott.com  
Hal D. Cunningham (CA 243048)  
hcunningham@scott-scott.com  
Patrick J. Rodriguez (*pro hac vice*)  
prodriguez@scott-scott.com  
Daniel J. Brockwell (CA 335983)

1 Allison Watson (CA 328596)  
2 awatson@bathaeedunne.com  
3 3420 Bristol St, Ste 600  
4 Costa Mesa, CA 92626-7133

dbrockwell@scott-scott.com  
600 W. Broadway, Suite 3300  
San Diego, CA 92101  
Tel.: (619) 233-4565

3 *Interim Co-Lead Counsel for the Advertiser Classes*

4  
5 **LEVIN SEDRAN & BERMAN LLP**

6 Keith J. Verrier (*pro hac vice*)  
7 kverrier@lfsblaw.com  
8 Austin B. Cohen (*pro hac vice*)  
9 acohen@lfsblaw.com  
10 510 Walnut Street, Suite 500  
11 Philadelphia, PA 19106-3997  
12 Tel.: (215) 592-1500

**AHDOOT & WOLFSON, PC**

Tina Wolfson (CA 174806)  
twolfson@ahdootwolfson.com  
Robert Ahdoot (CA 172098)  
rahdoot@ahdootwolfson.com  
Theodore W. Maya (CA 223242)  
tmaya@ahdootwolfson.com  
Henry J. Kelson (*pro hac vice*)  
hkelston@ahdootwolfson.com  
2600 West Olive Avenue, Suite 500  
Burbank, CA 91505  
Tel.: (310) 474-9111

10 *Members of Executive Committee for the Advertiser*  
11 *Classes*

**FILER ATTESTATION**

I am the ECF user who is filing this document. Pursuant to Civil L.R. 5-1(h)(3), I hereby attest that each of the other signatories have concurred in the filing of the document.

Dated: January 29, 2025

By: /s/ Brian J. Dunne  
Brian J. Dunne